



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

May 13, 2005

Certified Mail No. 7000 1670 0013 8129 0065

Mr. Tim Wright, President
C. Wright Construction, Incorporated
1320 South Black Cat Road
Meridian ID 83642

RE: Facility ID No. 001-00019, C. Wright Construction, Inc., Meridian
Final Tier II Operating Permit Letter

Dear Mr. Wright:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2-030055 for C. Wright Construction's rock crushing and hot-mix asphalt facility in Meridian, in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permit is based on the information contained in your permit application. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Tom Krinke of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd Permit No. T2-030055

Enclosure

c: June Ramsdell, Boise Regional Office
Laurie Kral, US EPA Region 10



**Air Quality
TIER II OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-030055

FACILITY ID No.: 001-00019

AQCR: 64

CLASS: SM

SIC: 1142

ZONE: 11

UTM COORDINATE (km): 544.0, 4826.0

1. PERMITTEE

C. Wright Construction, Inc.

2. PROJECT

Tier II Operating Permit Modification – Northern Ada County PM₁₀ Maintenance Plan

3. MAILING ADDRESS

1320 South Black Cat Road

CITY

Meridian

STATE

ID

ZIP

83642

4. FACILITY CONTACT

Tim Wright

TITLE

President

TELEPHONE

(208) 888-1307

5. RESPONSIBLE OFFICIAL

Tim Wright

TITLE

President

TELEPHONE

(208) 888-1307

6. EXACT PLANT LOCATION

1320 South Black Cat Road, Meridian, Idaho

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Sand, gravel, and crushed stone production and hot-mix asphalt

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: May 13, 2005

DATE EXPIRES: July 8, 2008

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. TIER II OPERATING PERMIT SCOPE	4
2. FACILITY-WIDE CONDITIONS	5
3. HOT - MIX ASPHALT PLANT	9
4. ASSOCIATED PROCESS EMISSIONS	11
5. SUMMARY OF EMISSION RATE LIMITS	12
6. TIER II PERMIT GENERAL PROVISIONS	13

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon dioxide
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
°F	degrees Fahrenheit
ft	feet
gr	grain(s)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
in	inches
km	kilometers
lb/hr	pound per hour
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
SIC	Standard Industrial Classification
SM	synthetic minor
SO ₂	sulfur dioxide
T/hr	tons per hour
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
Location:	Meridian, Idaho		Date Expires:	July 8, 2008

1. TIER II OPERATING PERMIT SCOPE***Purpose***

- 1.1 The purpose of this permit is to limit PM₁₀ emissions from this facility as part of the compliance strategy for the Northern Ada County PM₁₀ Maintenance Plan. This permit also allows for an increase in annual hot-mix asphalt production. A PM₁₀ performance test is required to demonstrate compliance with the PM₁₀ emission rate limit contained in this permit.
- 1.2 This permit modifies Tier II Operating Permit No. T2-000033, issued July 8, 2003, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.3 Table 1.1 lists all sources regulated in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	<u>Hot-mix Asphalt plant</u> Manufacturer: Barber Green Manufacture Date: 1950 Rated capacity: 106 T/hr Stack diameter: 24 in x 27 in Stack height: 12 ft Exhaust stack operating temperature: 155°F Exhaust gas flow rate: 18,300 acfm Fuel type: natural gas	<u>Wet Scrubber</u> Manufacturer: Unknown Efficiency: Unknown for PM ₁₀
4	Emissions associated with mined and processed river deposits	Reasonable water application

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

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2. FACILITY-WIDE CONDITIONS***Fugitive Dust***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, when practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
- 2.5 Fugitive emissions generated onsite shall not be observed leaving the facility boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Method 22, as described in 40 CFR 60, Appendix A, or a DEQ-approved alternative method.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
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Odors

- 2.6 In accordance with IDAPA 58.01.01.776, no person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.
- 2.9 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.11 The permittee shall comply with the *Rules for Control of Open Burning* in accordance with IDAPA 58.01.01.600-616.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
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Performance Testing

- 2.12 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2 FACILITY-WIDE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a, and EPA Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If NSPS, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or DEQ-approved alternative in accordance with IDAPA 58.01.01.157.

Air Stagnation Advisory Days

- 2.13 The permittee shall comply with the *Air Pollution Emergency Rule* in accordance with IDAPA 58.01.01.550-562.

Monitoring and Recordkeeping

- 2.14 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of measurements; and (b) the operating conditions existing at the time of measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring measurement. Supporting information includes, but is not limited to, all calibration and maintenance records, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.15 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
Location:	Meridian, Idaho		Date Expires:	July 8, 2008

At least 10 days prior to relocating, the permittee shall register any portable equipment covered by this permit using DEQ's Portable Equipment Registration and Relocation Form (PERF) available on the DEQ's Website at: www.state.id.us/deq/air/equiprelocat.htm. Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:

PERF Processing Unit
Idaho DEQ - Air Quality
1410 N. Hilton
Boise, ID 83706-1255

Obligation to Comply

- 2.16 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Fuel-burning Equipment

- 2.17 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas as required by IDAPA 58.01.01.676.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
Location:	Meridian, Idaho		Date Expires:	July 8, 2008

3. HOT - MIX ASPHALT PLANT**3.1 Process Description**

A hot-mix asphalt plant combines dried aggregates and hot oil to produce asphaltic concrete.

3.2 Control Description

This hot-mix asphalt plant's emissions are controlled by a wet scrubber.

Table 3.1 HOT-MIX ASPHALT PLANT

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Hot-mix asphalt plant	Wet scrubber	Scrubber stack outlet

Emissions Limits**3.3 Emission Limits**

PM₁₀ emissions from the hot-mix asphalt plant's scrubber stack shall not exceed any corresponding emission rate limit listed in Tables 3.2 and 5.1 of this permit.

Table 3.2 EMISSIONS LIMITS

Source Description	PM ₁₀	
	lb/hr	T/yr
Hot-mix asphalt plant's scrubber stack	4.86	1.80

Operating Requirements**3.4 Production Rate**

The asphalt production shall not exceed 80,000 tons per any consecutive 12-month period.

3.5 Operating Hours

The permittee shall not operate the hot-mix asphalt plant for more than 12 hours in any calendar day.

3.6 Hot-Mix Asphalt Plant Burner Fuel

The permittee shall combust natural gas exclusively in the hot-mix asphalt plant's burner.

3.7 O & M Manual

Within 60 days after issuance of this permit, the permittee shall have developed an O&M manual for the wet scrubber that describes the procedures followed to comply with General Provision 6.2. The O&M manual shall remain onsite at all times and shall be made available to DEQ representatives upon request. Upon its completion, a copy of the O&M manual shall be provided to DEQ in accordance with Permit Condition 2.15.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
Location:	Meridian, Idaho		Date Expires:	July 8, 2008

3.8 PM₁₀ Performance Testing Requirement

At least once during the term of this permit, the permittee shall conduct a performance test in accordance with the test methods and procedures contained in IDAPA 58.01.01.157 and Permit Condition 2.12 to measure PM₁₀ emissions from the hot-mix asphalt plant exhaust stack to demonstrate compliance with Permit Condition 3.3.

Monitoring and Recordkeeping Requirements**3.9 Operating Parameter Monitoring and Recordkeeping Requirements**

The permittee shall monitor and record the following information. Records of this information shall be maintained in accordance with Permit Condition 2.14.

- 3.9.1 The amount of asphalt produced monthly and annually. Monthly production shall be summed for the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.
- 3.9.2 Startup and shutdown of the hot-mix asphalt plant each day the plant operates to demonstrate compliance with Permit Condition 3.5.

3.10 Performance Test Protocol

At least 30 days prior to conducting any emission test, the permittee is encouraged to submit a written performance test protocol to DEQ in accordance with IDAPA 58.01.01.157.01.a.

3.11 Performance Test Report

In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to DEQ within 30 days of completion of the test.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
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4. ASSOCIATED PROCESS EMISSIONS

- 4.1 PM₁₀ emissions result from mining and/or crushing aggregate. The processes involved in mining and/or crushing activities include, but are not limited to, the following: loading, crushing, screening, transferring, stockpiling, and vehicle traffic on paved and unpaved roads.

Table 4.1 ASSOCIATED PROCESS EMISSIONS

Process	Emissions Control Device	Emissions Point
Associated process emissions	Reasonable control	NA

Emissions Limits**4.2 Emission Limits**

PM₁₀ emissions from sand and gravel transfers, crushers, screens, vehicle traffic and associated processes shall not exceed 31 tons per any consecutive 12-month period.

Operating Requirements**4.3 Sand and Gravel Mining**

River deposits that are mined shall not exceed 729,000 tons per any consecutive 12-month period.

4.4 Processed Material

River deposits that are processed (crushed, screened, transferred, etc.) shall not exceed 461,000 tons per any consecutive 12-month period.

4.5 Skimmer Screen and Stand-alone Screen Deck NSPS Opacity Limit

PM emissions from the NSPS affected skimmer screen deck (1986 project) and the stand-alone screen deck (1997 project) shall not exhibit greater than 10% opacity as required by 40 CFR 60.672(b).

Opacity shall be determined using procedures specified in IDAPA 58.01.01.625.04.

Monitoring and Recordkeeping Requirements

- 4.6 The permittee shall monitor and record the following information. Records of this information shall be maintained in accordance with Permit Condition 2.14.
- 4.6.1 The total amount of river deposits mined monthly and annually. Monthly throughput shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 4.3. The total amount of river deposits mined means the amount that is mined for use by the permittee plus the amount that is mined and sold to the general public, contractors, etc.
- 4.6.2 The total amount of river deposits processed by the permittee monthly and annually. Monthly throughput shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 4.4.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

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Location:	Meridian, Idaho		Date Expires:	July 8, 2008

5. SUMMARY OF EMISSION RATE LIMITS

Table 5.1 provides a summary of all emission rate limits required by this permit.

Table 5.1 SUMMARY OF EMISSION RATE LIMITS

C. Wright Construction, Meridian Emission Limits^a – Hourly (lb/hr), and Annual^b (T/yr)		
Source Description	Hourly PM₁₀^c Emissions (lb/hr)	Annual PM₁₀^c Emissions (T/yr)
Hot-mix asphalt plant's scrubber stack	4.86	1.80
All associated process emissions (fugitives included)	NA	31

^a As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by the DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensibles.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-030055

Permittee:	C. Wright Construction, Inc	Facility ID No. 001-00019	Date Issued:	May 13, 2005
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6. TIER II PERMIT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.